

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

---

KRISTINA RAPUANO, VASSIKI  
CHAUHAN, SASHA BRIETZKE,  
ANNEMARIE BROWN, ANDREA  
COURTNEY, MARISSA EVAN, AND  
JANE DOE,

Plaintiffs,

v.

TRUSTEES OF DARTMOUTH  
COLLEGE,

---

Defendants.

Civil Action No. 1:18-cv-01070-JD

**Response of Defendants, Trustees of Dartmouth College, to Plaintiff Jane Doe's  
Motion Seeking a Protective Order Sealing Portions of the Court Record, Doc. 3-1**

Defendants, Trustees of Dartmouth College, respond to Plaintiff Jane Doe's Motion  
Seeking a Protective Order Sealing Portions of the Court Record, Doc. 3-1 as follows:

Defendants do not oppose Plaintiff Jane Doe's Motion at this time. However, Defendants  
reserve their right to seek the cessation of the protective order and to have documents publicly  
revealed if the use of the sealing mechanism interferes with Defendants' ability to defend or  
impacts the question of whether the Plaintiff can act as a representative of a putative class.

Respectfully Submitted,

TRUSTEES OF DARTMOUTH COLLEGE

By their attorney,

/s/ Joan A. Lukey

Joan A. Lukey (N.H. Bar ID #16246)  
CHOATE HALL & STEWART LLP  
Two International Place  
Boston, Massachusetts 02110

Telephone: (617) 248-5000  
Fax: (617) 248-4000  
[joan.lukey@choate.com](mailto:joan.lukey@choate.com)

Date: November 21, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that on November 21, 2018, I caused a true and correct copy of the foregoing Response, filed through the ECF system, to be served electronically on all counsel of record identified on the Notice of Electronic Filing (and below) as registered participants, and that copies will be sent via first class mail to those counsel who are not registered participants on the ECF system.

Charles G. Douglas, III  
DOUGLAS, LEONARD & GARVEY, P.C.  
14 South Street, Suite 5  
Concord, NH 03301  
(*Served via ECF*)

David Sanford  
Nicole Wiitala  
SANFORD HEISLER SHARP, LLP  
1350 Avenue of the Americas, 31<sup>st</sup> Floor  
New York, New York 10019  
(*Served via First Class Mail*)

/s/ Joan A. Lukey  
Joan A. Lukey